



## Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

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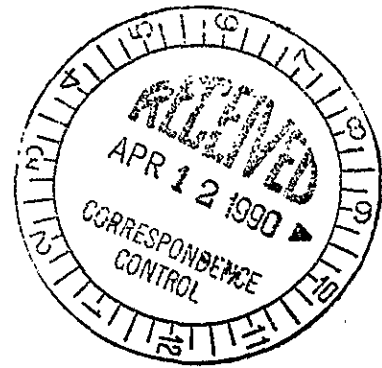
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MAR 21 1990

# START

Mr. Paul T. Day  
Hanford Project Manager  
U. S. Environmental Protection Agency  
Region 10  
P. O. Box 550, A6-95  
Richland, Washington 99352

Mr. Timothy L. Nord  
Hanford Project Manager  
State of Washington  
Department of Ecology  
Mail Stop PV-11  
Olympia, Washington 98504-8711



Dear Messrs. Day and Nord:

SUBMITTAL OF DRAFT D OF THE REMEDIAL INVESTIGATION/FEASIBILITY (RI/FS) STUDY WORK PLAN FOR THE 300-FF-1 OPERABLE UNIT AND DRAFT C OF THE RI/FS STUDY WORK PLAN FOR THE 300-FF-5 OPERABLE UNIT

By this letter, five copies each of the above subject reports are transmitted to the U. S. Environmental Protection Agency (EPA) and three copies each are transmitted to the Washington State Department of Ecology for initiation of the public review and comment period.

Per the February 26, 1990, letter from D. R. Einar, EPA, to K. M. Thompson and R. K. Stewart, DOE-RL, "Review of RI/FS Work Plan for the 300-FF-5 Operable Unit Draft B and 300-FF-1 Operable Unit Draft Revision 3," the schedules in these drafts include both target dates/milestones for critical documents and show the critical path for corresponding activities. In addition, the technical issues associated with the 300-FF-5 Work Plan have been resolved and the responses provided (Attachment 1), as agreed upon in the meeting held on March 1, 1990.

Other changes incorporated into both Work Plans include changes made to the Health & Safety Plans. To aid in your review of these changes, attached are copies of the internal Westinghouse Hanford Company "Comment Record Forms" which were used in making these changes (Attachments 2, 3, and 4). Finally, minor changes were made to the Work Plan schedules, these changes do not impact the overall schedule durations.



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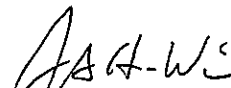
Messrs. Day and Nord

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MAR 21 1990

If there are any questions or need for additional information, please contact Mr. R. K. Stewart on (509) 376-6192) for 300-FF-1 or Mr K. M. Thompson on (509) 376-6421) for 300-FF-5.

Sincerely,



Steven H. Wisness  
Hanford Project Manager

ERD:KMT

Attachments

cc w/att:

L. C. Hulstrom, WHC

T. M. Wintczak, WHC

R. M. Smith, PNL

~~T. M. Wintczak, WHC~~

Administrative Record

(copy provided by WHC)

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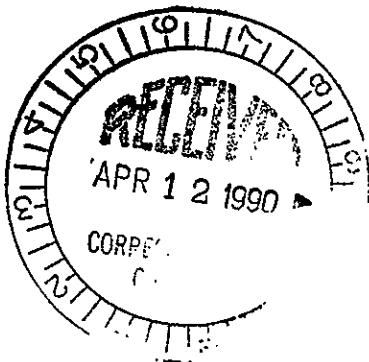
# **CORRESPONDENCE DISTRIBUTION COVERSHEET**

<b>Author</b>	<b>Addressee</b>	<b>Correspondence No.</b>
S. H. Wisness, DOE-RL	P. T. Day, EPA T. L. Nord, Ecology	9001422

**Subject:** SUBMITTAL OF DRAFT D OF THE RI/FS WORK PLAN FOR THE 300-FF-1  
OPERABLE UNIT AND DRAFT C OF THE RI/FS WORK PLAN FOR THE 300-FF-5  
OPERABLE UNIT

## **INTERNAL DISTRIBUTION**

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		M. R. Adams	H4-55	
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		L. C. Brown	H4-51	X
		C. DeFigh-Price	B2-20	
		K. R. Fecht	H4-56	
		V. W. Hall	B2-15	X
		K. L. Hoewing	B3-06	
		W. L. Johnson	H4-55	
		R. E. Lerch (Assignee)	B2-35	X
		H. E. McGuire	B2-35	X
		A. L. Mize	B2-35	X
		R. C. Nichols	B3-02	X
		J. E. Nolan	B3-01	
		K. Parnell	H4-18	X
		D. E. Simpson	B3-51	X
		J. L. Waite	B2-35	X
		S. A. Wiegman	B2-19	
		T. M. Wintczak	B2-15	X
		R. D. Wojtasek	B2-15	X
		EDMC	H4-22	X
		TPAI&C File	B2-35	X



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Correspondence Distribution Coversheet

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RESPONSES TO REGULATORY REVIEW COMMENTS  
300-FF-5 WORK PLAN (DRAFT B)

Comment 13: The purpose of the coordinate system is to provide a scale. The Lambert coordinate system was chosen for figures in this report, but when using a figure from another report, that coordinate system was retained. The coordinate systems are not required to locate the operable units on different figures; unit boundaries, roads, facilities, and other landmarks are used to orient the reader between maps.

Comment 75: The response to comment 75 was incorporated into Sections 2.2.3.2 and 2.2.4 as recommended. A separate section was not created.

Comment 26: It will be noted that the species composition and distribution of flora and fauna in the 300-FF-5 operable unit is similar to other areas along the Hanford reach of the Columbia River.

Comment 40: The exceptions will be added as a parenthetical statement.

New Comment, Section 3.1.3.2.2, p. 89: The problem occurs in the interpretation of Figure 27. A 30 ppm contour will be added to the figure to make it more clear that ground water in the vicinity of the 316-5 process trenches contained between 20 and 30 ppm nitrate in June of 1986. Comparing this information with Figure 28 shows that nitrate concentrations in the same area decreased to less than 5 ppm in August 1988.

New Comment, Section 5.3.3, p. 157: Section 5.3.3 will be revised to indicate that vadose zone background soil concentrations will be established in the 300-FF-1 RI/FS and saturated zone background soil concentrations will be established in this RI/FS. In addition, sediment samples used in leaching tests will be obtained from the 300-FF-1 RI/FS.

Comment 43: Additional justification for DNAPL well locations will be added to Section 5.3.4.2, p. 168. This justification will include reference to Sections 2.2.2.2.1 (westerly dip of the top of the M3 clay layer) and 3.1.3.2.3 (process trenches as a DNAPL source and southeasterly migration of perchloroethene from the source). As a result, the wells are located to the west and south of the process trenches with the exception of 1-10B which is located east of the trenches. The location of 1-10B was selected to provide an eastern "closure" of any DNAPL plumes encountered. If DNAPLs are present, they would tend to migrate down-dip along the top of the M3 clay layer. For this reason, the well distribution is skewed in that direction (west).

Well 1-20 does indeed have a port at 120 feet which is the top of the M3 layer. This well was installed for research reasons and is being monitored accordingly. Currently, data collected from the Westbay system are erratic and may not be accurate due to limitations on purging and leakage of water from the well column into the formation as the sampler is seated. These conditions may explain the erratic results, but whatever the reasons, there is no traditionally completed monitoring well at that location that could be used to monitor DNAPLs.

9 0 1 1 7 3 1 0 4

New Comment, Section 5.3.4.1.1, p. 160: The intent of the comment will be incorporated into the work plan, but the specific recommendation will be modified. For the same reason wells 9AB will be allowed as nested wells, wells 5AB and 6AB should also be constructed as nested wells. Only where the M3 confining layer is to be penetrated in an area of known ground-water contamination will a separate "C" well be drilled. Therefore, the plan will be revised to show that wells 5C and 6C will be drilled as separate wells.

Comment 90: The response concerning nitrate was nonresponsive. The key in understanding the separate chloroform and uranium sources is first knowing the concentrations of these constituents in process water. Process water contains no nitrate and uranium but does contain elevated chloroform concentrations introduced during the chlorination process through which the water is treated. Therefore, the chloroform plume map shows a "source" of chloroform near the suspected leak. Nitrate, on the other hand, is not present in process water and a nitrate "hole" is present at the same location as the chloroform "high." This information will be added to the discussion on p. 173 of Draft B.

Comment 96: Sections 5.3.4.5 and 5.3.9.3 will be revised to reflect the position that performance and risk assessments will make use of Hanford-wide codes such as PORLO-3 or and approved alternate.

New Comment, Section 5.3.5.2, p. 181: The recommendation will be incorporated into the discussion of spring sampling on p. 181.

New Comment, Figure 43, p. 183: The use of a dye test will be added to p. 182 to determine the exact positions of locations 3 and 4 in Figure 43, p.183.

New Comment, Table 1, SAP/FSP-4: Reject. Table 1 is not a list of wells to be sampled but a list of new wells to be drilled. Ground-water sampling is discussed in Section 1.2. In this section it states that all wells in the existing monitoring network (approximately 50) and new wells will be sampled once to establish a baseline. A statement will be added to Section 1.2.2, p. SAP/FSP-15, indicating that water pumped from wells 399-4-12 and 399-4-8 will be sampled.

Comment 132(1): A reference to Figure 2 will be added.

Comment 137: Reference to Section 3.1.2 and Table 7 will be added.

New Comment, Table 3, p. SAP/QAPP-13-16: The footnote will be changed as recommended.

## ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM

1. DATE 12-20-892. PAGE 1 OF 6

3. DOCUMENT TITLE/NUMBER

DOE/RL 88-31, Draft Revision 2, "Draft Remedial Investigation/  
Feasibility Study Work Plan for the 300-FF-1 Operable Unit, Hanford Site,  
Richland, Washington."4. LEAD ENGINEER/SCIENTIST L. C. Hulstrom5. ORGANIZATION 200/300 EES6. LOCATION/PHONE/MSIN 450 Hills/6-4034/H4-567. REVIEWER Ms. D. J. Alexander8. ORGANIZATION IS&FP/IS&H9. LOCATION/PHONE/MSIN 2753E/B106/200E 3-2627 R3-54

10. THE DOCUMENT WAS REVIEWED AND THE REVIEWER HAD NO COMMENTS.

Reviewer \_\_\_\_\_ 11. Date \_\_\_\_\_

12. I HAVE REVIEWED THE DISPOSITION OF COMMENTS WITH THE  
EEG LEAD ENGINEER/SCIENTIST.Reviewer Debra J. Alexander 13. Date 1-4-90

14. ITEM	15. COMMENT(S) Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment). *	16. DISPOSITION (Provide Brief Justification if NOT Accepted). *
1.	p. HSP/2, 1st para., Missing designated personnel responsible for site safety and health. These must be filled in prior to the start of work at the 300-FF-1 Operable Unit.	This information will be Task specific and will be properly recorded/designated before the task is initiated.
2.	p. HSP/3, 1st para., 5th bullet. I assume the SSO is halting operations due to safety and/or health concerns, this should be stated as part of this bullet. Reasons must be given for halting operations.	Additional wording added as suggested.
3.	p. HSP-3, 2nd para., 1st sent. Change RWP reference from PNL to WHC. We are using WHC HPTs for this work.	Changed to "appropriate"
4.	p. HSP/3, 3rd para., 4th sent. Insert the word 'temporary' between "has" and "stop-work". Add another sentence as follows: When work is temporarily halted due to a safety or health concern; personnel will exit	Suggested changes incorporated

\*Comments and Dispositions May also be Presented in Sequential Format Instead of the Left/Right Format Shown Above. Comments May also be Submitted on 5 1/4" Disk, Using Wordperfect Ver. 4.2. In this Case the Reviewer Must Submit Page 1, a Printed Listing of the Comments and the Disk.

ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM (CONT.)

REVIEWER

*D. J. Alexander*  
Ms. D. J. Alexander

R3-54

3-2627

PAGE 2 OF 5

ITEM	COMMENT(S) (Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment).	DISPOSITION (Provide Brief Justification if NOT Accepted).
4.	continued. the exclusion zone and meet at the predetermined place in the support zone (per emergency response section). The Field Team Leader, Site Safety Officer, and HPT will determine the next course of action.	
5.	p. HSP-3, Section 1.3, 1st para. The physical exam for WHC hazardous waste workers (jobs regulated by 29 CFR 1910.120) is called "Hazardous Waste" on the HEHF appointment form. This box must be checked for the employees to get the proper medical exam for this work.	Noted.
6.	p. HSP-5, Section 1.4, 3rd para. An employee supervising the three day work experience training of an inexperienced employee <u>must</u> be fully trained/qualified, not just 'experienced' as you say in this paragraph. Any employee who meets these requirements can supervise the trainee, they just have to be <u>fully</u> trained and qualified.	Experienced employee replaced with the Site Safety officer or the Field Team Leader
7.	p. HSP-5, Section 1.4, 4th para. Training the field team leader and site safety officer to the manager level is not required by the regulations. However, if your management has determined that it is necessary, then go ahead.	Noted.
8.	p. HSP-5, Section 1.5, 1st para., 1st sent. Change the word 'licensed' to "HEHF". All WHC employees are approved by <u>HEHF</u> physicians.	Suggestion incorporated

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ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM (CONT.)

REVIEWER Ms. D. J. Alexander R3-54 3-2627

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ITEM	COMMENT(S) (Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment).	DISPOSITION (Provide Brief Justification if NOT Accepted).
9.	p. HSP-7, 8th bullet. I believe that the document you cite here is wrong. Replace GEN-0 with applicable WHC manual (I think its WHC-CM-4-10).	Reference: changed
10.	p. HSP-7, 12th bullet. Sentence should read as follows: A mandatory 'tail-gate' meeting will be conducted prior to the start of drilling operations.	Missing words re-inserted
11.	p. HSP-8, Section 2.1.2, 5th bullet. In a drilling operation (e.g. augering, driving casing, etc.), the zone around the rig - usually the exclusion zone, should be posted "Hearing Protection Required". We know ahead of time that this operation will require hearing protection, due to the level of noise.	Sentence added. "The exclusion zone around the drill rig should be posted "Hearing Protection required".
12.	p. HSP-8, Section 2.1.3, 3rd bullet. It is not a good practice to send a potentially contaminated individual home to shower. If contamination is suspected, then arrangements need to be made for that individual to shower prior to leaving the work site (i.e. Hanford site or area where work was being done). If you do not make provisions for this, we leave the personnel in charge of the operation and the company wide open for potential legal action on the part of the affected worker.	Wording changed to require showering, (if required), before leaving the work site or Hanford area.
13.	p. HSP-9, Section 2.1.4. Add a 3rd bullet stating the following: The Hanford Fire Department will be notified of the location and nature of field work activities prior to the start of those activities. A site	Comment incorporated



ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM (CONT.)

REVIEWER

*D.J. Alexander*  
Ms. D. J. Alexander R3-54 3-2627

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ITEM	COMMENT(S) (Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment).	DISPOSITION (Provide Brief Justification if NOT Accepted).
13.	continued. location map shall be included in this notification.	
14.	p. HSP-9, Section 2.2. Please add to this section the following information: If confined spaces are going to be entered as part of the work operations, a Hazardous Work Permit (filled out for confined space entry) must be obtained from Industrial Safety and Fire Protection. Confined Space Entry Requirements are discussed in Standard/Guide W-13 in WHC-CM-4-3, "Industrial Safety Manual".	First sentence of comment incorporated. Second sentence not included since it references an uncleared document.
15.	p. HSP-20, Section 4.3, 5th para. In an earlier section (Section 1.1 Introduction) you called the site specific safety plans 'SSP's'. In this section you call them 'PJSP's'; please refer to them by one name, the name used by IS&FP is "Pre-Job Safety Plan".	SSP changed to PJSP
16.	p. HSP-21, Section 5.0. General comment: The practice(s) of ALARA apply to chemical exposures too. Reword the sentence discussing ALARA to include the chemical reference too.	Paragraph reworded slightly.
17.	p. HSP-21, Section 5.0. General comment: Any time personnel sampling to determine exposures is required to be done, it must be done by HEHF. This ensures that the sampling is done properly and documented, so as to be defensible in the event that legal actions become necessary. This needs to be stated wherever you mention the need for this type of monitoring.	First sentence of comment added to second paragraph of 5.0.

ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM (CONT.)

REVIEWER

*D. J. Alexander*  
Ms. D. J. Alexander

R3-54 3-2627

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ITEM	COMMENT(S) (Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment).	DISPOSITION (Provide Brief Justification if NOT Accepted).
18.	p. HSP-25, Section 6.1, 3rd para. You state in this paragraph that "Air-purifying respirators shall be immediately available..."; this covers the need to upgrade to Level C respiratory protection if necessary. It does not cover the need to upgrade to Level B respiratory protection if necessary. However, you state later in the sentence "...and Level D respiratory protection shall be immediately upgraded to Level C or Level B as appropriate." You need to delete the reference to 'Level B' here, or add that air-supplied respiratory protection equipment will also be available at the work site.	Reference to Level B deleted
19.	p. HSP-27, Section 7.0, 1st para., last sent. If you are surveying for radiation contamination prior to leaving the exclusion zone, what are you doing to prevent the spread of potential chemical contamination from the exclusion zone? If it is not a problem at this site, then say so. If it is, then you must state how you will mitigate it. The way it is written right now, it looks like the problem hasn't even been considered.	Sentence added. "All personnel who enter the exclusion zone will be required to go through decontamination procedures (radiological and chemical) before leaving the zone."
20.	p. HSP-29, Section 8.2 (and others, as applicable). All wash liquids used for decon. purposes must not only be collected (as you state here), but they will also require proper disposal per applicable state and/or federal regulations (e.g. decon. fluids that have the potential to be designated as Dangerous Waste by WDOE).	Comment added to Section 8.1 and paragraph 1 of 8.2.

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## ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM (CONT.)

REVIEWER

Ms. D. J. Alexander

R3-54 3-2627

PAGE 6 OF 6

ITEM	COMMENT(S) (Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment).	DISPOSITION (Provide Brief Justification if NOT Accepted).
21.	p. HSP-31, Section 9.0, 4th para., last sentence. The site safety officer should also give the Hanford Fire Department a location map of the work site, to expedite their finding the location, if necessary.	Additional wording added to 2nd paragraph.
22.	p. HSP-36, Section 9.8, Industrial Safety telephone number is wrong. The number listed here is for a PNL employee. It should be a WHC IS&FP person: H. N. Bowers 3-3948	WHC name added to the PNL name listed.

Industrial Safety & Fire Protection

OPERATIONS CHECKLIST  
HAZARDOUS WASTE OPERATIONS  
29 CFR 1910.120

1. PROJECT NAME: RI/FS Work Plan for the 3CO-FF-1 Operable Unit  
Lincoln, Hanford Site, Richland, WA
2. SCOPE OF PROJECT: RI/FS activities for the 3CO-FF-1 Operable Unit

3. WHC PROJECT ENGINEER (Responsible Person):

LOCATION:

PHONE:

MANAGER:

Not listed, is it Larry Hwilstrom?

4. PROJECTED SCHEDULE:

Start July 89

Complete 1994

5. SAFETY AND HEALTH PLAN:

Yes No

☐ Key personnel identified?.....

Yes No

☐ Hazard analysis performed?.....

Yes No

☐ Hazard class: Low \_\_\_\_\_ Moderate \_\_\_\_\_ High \_\_\_\_\_

Variable with task

☐ Training complete and documented for WHC employees

working in exclusion (controlled) area?.....

☐ Personal protective equipment:.....

Identified?.....

Available?.....

Available Where? At site

☐ Medical surveillance requirements identified?.....

☐ Air monitoring required?.....

Frequency? As required

☐ Site control measures identified?.....

☐ Decontamination procedures identified?.....

☐ Contingency plan identified?.....

Written for emergency response?.....

☐ Entry of confined spaces?.....

Probably not, but discuss in case

6. CHEMICAL CHARACTERISTICS ADEQUATELY IDENTIFIED?.....

Comments:

7. GENERAL SANITATION SERVICES ADEQUATE?.....

8. KEH CONSTRUCTION FORCES AND/OR KEH OR WHC

SUBCONTRACTOR PERSONNEL ON PROJECT?.....

N/A

NAME:

Subcontractor safety and health plan evaluated by project engineer and found to be consistent with WHC Project Safety and Health Plan?.....

N/A

Training complete and documented in writing for construction and or subcontractor employees working in exclusion (controlled) area?.....

N/A

## ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM

1. DATE Feb. 27, 19902. PAGE 1 OF 17

## 3. DOCUMENT TITLE/NUMBER

DOE-RL 88-31, Draft Revision 2, "Draft RI/FS Work Plan for the 300-FF-1 Operable Unit, Hanford Site, Richland, Washington.

4. LEAD ENGINEER/SCIENTIST L. C. Hulstrom5. ORGANIZATION 200/300 Env. Eng.6. LOCATION/PHONE/MSIN 450 HIs/6-4034/H4-557. REVIEWER M. L. Dentler8. ORGANIZATION EFS - EH&PS9. LOCATION/PHONE/MSIN MO-407/103/200E/3-4524/SO-03

10. THE DOCUMENT WAS REVIEWED AND THE REVIEWER HAD NO COMMENTS.

Reviewer \_\_\_\_\_

11. Date \_\_\_\_\_

12. I HAVE REVIEWED THE DISPOSITION OF COMMENTS WITH THE  
EEG LEAD ENGINEER/SCIENTIST.Reviewer M. L. Dentler per Telecon13. Date 3/9/90

14. ITEM	15. COMMENT(S) Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment). *	16. DISPOSITION (Provide Brief Justification if NOT Accepted). *
	<p>Attached are 120 comments. A diskette will be provided with a red-lined copy to facilitate review and dispositioning.</p> <p>Many of the changes recommended are needed to align the HSP with current EIs from WHC-CM-7-7. Other changes reflect differences in field operations as they have evolved since the draft HSP was first written, including interactions between WHC and the DOE, various subcontractors on each work site, and Hanford support groups.</p> <p>Because the HSP is the overall controlling document for this work, and the individual PJSPs are the field operating documents, the HSP must be written broadly enough to allow for differences in each PJSP. This means that references to site-specific procedures in the PJSP must be consistent with the HSP, which is the document used</p> <p>(CONTINUED)</p>	

\*Comments and Dispositions May also be Presented in Sequential Format Instead of the Left/Right Format Shown Above. Comments May also be Submitted on 5 1/4" Disk, Using Wordperfect Ver. 4.2. In this Case the Reviewer Must Submit Page 1, a Printed Listing of the Comments and the Disk.

ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM (CONT.)

REVIEWER M. L. Dentler

PAGE 2 OF 217

ITEM	COMMENT(S) (Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment).	DISPOSITION (Provide Brief Justification if NOT Accepted).
	<p>by those auditing field work for HSP compliance. It also requires removal of those specific details originally included when the HSP itself was to be the field operating document.</p> <p>Editorial changes have been recommended to enhance the readability of the document by eliminating statements and information not immediately related to the purpose of the HSP. Also, while repetition and redundancy are not technically incorrect per se, it is better to have as little as possible in a document of this length. These changes facilitate understanding and complying with the provisions of the HSP.</p>	

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300-FF-1 HASP

1. HSP-1 - Following Paragraph One: Add; "All employees of Westinghouse Hanford Company (WHC) or any other contractors who are participating in onsite activities at 300-FF-1 shall:

Read and sign this document.

Attend a pre-job safety meeting to review and discuss this document.

Follow all health and safety procedures specified in this document and in the applicable Pre-Job Safety Plan (PJSP).

Each PJSP must be read and signed by all involved personnel. Employees are encouraged to bring any questions or lingering concerns to the safety officer. The approved PJSP will serve as the agenda for a mandatory "tail-gate" safety meeting before start-up each day. Additional tail-gate safety meetings or safety briefings will be held at any time it is deemed necessary by the site safety officer, the health physics technician (HPT), or the field team leader." (Consolidates information.)

Disposition - Accept with slight modifications as discussed on February 27, 1990.

2. HSP-1 - Third Paragraph: Replace with: "Each PJSP will be reviewed and approved by: the Project Coordinator, the Field Team Leader, the Site Safety Officer, the Environmental Health and Pesticide Services Manager, Industrial Safety and Fire Protection Health Physics, the Responsible Manager, and the manager of any other WHC personnel with work responsibilities at the site. The PJSP will also be reviewed and signed for concurrence by any non-WHC contractor whose personnel are participating at the job site." (Adds information consistent with EII 2.1, Rev. 2, WHC-CM-7-7)

Disposition - Accept with slight modifications as discussed on February 27, 1990.

3. HSP-1 - Fourth Paragraph, Second sentence: Replace with: "Should any situations arise which is judged to be beyond the scope of the monitoring, personal protection, or decontamination procedures specified here or in the PJSP, work activities will stop and all personnel will withdraw from the exclusion zone as directed by the site safety officer, the HPT, and field team leader. After review of the situation, the site safety officer will determine the need to upgrade the level of protection as specified in the PJSP or to revise the health and safety procedures for this activity." (Refers to more specific action.)

Disposition - Accept.

4. HSP-3 - 1.3 Medical Surveillance, First Paragraph: Should read; "hazardous waste worker medical surveillance program." (This is a more extensive surveillance).

Disposition - Accept.

5. HSP-5 - Second Paragraph; Change "site safety officer or the field team leader" back to "a trained, experienced person." (There are often several OJT's on a job site at the same time. Each will be training for a specific activity, usually with the experienced team member who is responsible for that activity. All members of the field team are supervised by the field team leader and site safety officer; it is safer to have supervision of OJT's on a one on one basis as well).

Disposition - Accept.

6. HSP-5 - 1.5: Replace with: "All employees of WHC and subcontractors who may be required to use air-purifying or air-supplied respirators must be included in a medical surveillance program and be approved for the use of respiratory protection by a HEHF or other licensed physician. Each team member must be trained in the selection, limitations, and proper use and maintenance of respiratory protection (existing respiratory protection training may be applicable to the 40-hour training requirement).

Before using any negative-pressure respirator, each employee must be fit-tested (within the past year) for the specific make, model, and size of respirator the individual will be using, according to WHC fit testing procedures. Beards (including a few days' growth), large sideburns, or moustaches which may interfere with a proper respirator seal are not permitted.

Subcontractors must provide evidence to WHC that their medical surveillance and respiratory protection programs comply with 29CFR 1910.120 (OSHA 1988a) and 29 CFR 1910.134, respectively." (Change to clarify content and specify subcontractors standards).

Disposition - Accept.

7. HSP-6 - First Paragraph, Last Sentence: Change; Westinghouse Hanford" to "all job-site." (Includes subcontractors' employees).

Disposition - Accept.

8. HSP-6 - 2.1.1, Third Bullet: Change: "NBR or neoprene rubber gloves" to "the protective gloves specified in the PJSP." (The PJSP may specify a different type of glove).

Disposition - Accept.

9. HSP-6 - 2.1.1, Seventh Bullet: Change; "below" to "in the PJSP." (Procedures referenced will be included in the PJSP).

Disposition - Accept.



10. HSP-6 - 2.1.1, Thirteenth Bullet: Delete; "cable tool." (Statement should apply to all types of drill rigs).

Disposition - Accept.

11. HSP-7 - 2.1.1, Fourteenth Bullet: Change to; "Follow all provisions of each site-specific Hazardous Work Permit as addressed in the PJSP including:

Cutting and welding  
Confined space entry  
Excavation

(Reflects current procedures).

Disposition - Accept.

12. HSP-7 - 2.1.1, Sixteenth Bullet: Replace with; "Follow all provisions of each site-specific Radiation Work Permit."

Disposition - Accept.

13. HSP-7 - 2.1.1: Delete bullets 19 and 20. (Stated several times elsewhere).

Disposition - Accept.

14. HSP-6&7 - 2.1.1: In general; Change order of bullets. Numbers 11, 12, 16, and 18 become 3, 4, 5, and 6. (These are worded as policy statements and grouping them makes reading easier).

Disposition - Accept.

15. HSP-8 - 2.1.2, Second Paragraph: Change "shall" to "should." (Shall is unenforceable in this instance.)

Disposition - Accept.

16. HSP-8 - 2.1.2, Third Paragraph: Add "Personnel should" be alert -----  
"and judgement."

Disposition - Accept.

17. HSP-8 - 2.1.2, Delete the first, fourth and fifth paragraph.  
(Information incorporated in new text below.)

Disposition - Accept.

18. HSP-8 - 2.1.2, Add text below as first, second, third and fourth paragraph.

2.1.2, Personal protective equipment will be selected specifically for the hazards identified in the PJSP. The health and safety officer is

responsible for choosing the appropriate type and level of protection required for different activities at the job site.

Levels of protection shall be appropriate to the hazard to avoid either excessive exposure or additional hazards imposed by excessive levels of protection. The PJSP will contain provisions for adjusting the level of protection as necessary. These PPE specifications must be followed at all times, as directed by the field team leader, HPT, and site safety officer.

Each employee must have available a hard hat, safety glasses, and substantial protective footwear to wear if specified in the PJSP.

The exclusion zone around drilling or other noisy operations will be posted "Hearing Protection Required." The type of hearing protection to be worn will be specified in the PJSP with other protective equipment.

Disposition - Accept.

19. HSP-8 - 2.1.3, Add as first paragraph: The PJSP will describe in detail methods of personnel decontamination, including the use of contamination control corridors and step-off pads when appropriate. (Current Practice.)

Disposition - Accept.

20. HSP-8 - 2.1.3, Change heading "Decontamination" to "Personal Decontamination." (Clarification).

Disposition - Accept.

21. HSP-9 - 2.1.4, Second Paragraph: Change to read, "Prearranged hand signals or other means of emergency communication will be established when respiratory protection equipment is to be worn, since this equipment seriously impairs speech communications." (Clarification.)

Disposition - Accept.

22. HSP-9 - 2.1.4, Third Paragraph: Change to read, "The Hanford Fire Department shall be notified prior to the start of an RI/FS project. This notification shall include the location and nature of the various types of field work activities as described in the work plan. A site location map shall be included in this notification." (Clarification).

Disposition - Accept.

23. HSP-9 - Last Paragraph: Change to, "Before entering any confined space, including any test pit, the atmosphere will be tested for flammable gases, oxygen deficiency, and organic vapors. If other specific contamination, such as radioactive materials or other gases and vapors may be present, additional testing for those substances shall be conducted. Depending on the situation, the space may require

ventilation and retesting before entry." (Change needed in order to include all necessary measurements, while avoiding unnecessary ones).

Disposition - Accept.

24. HSP-18 - Last Row, First Column: Change the p/m for tetrachloroethylene from 50 to 25 and mz/m3 from 335 to 170. (Changes reflect latest OSHA PEL, which is lower).

Disposition - Accept.

25. HSP-18 - Page number missing; add HSP-18.

Disposition - Accept.

26. HSP-19 - Second Paragraph: Change "are" to "is."

Disposition - Accept.

27. HSP-20, 3rd para.: delete 2nd sent. (Minimum level of PPE will be specified in PJSP).

Disposition - Accept.

28. HSP-20, 3rd para., next to last sent.: delete "a minimum" and delete "and all other sampling will require D-3". Specified in PJSP.

Disposition - Accept.

29. HSP-20, 5th para.: change "threshold limit values (TLVs)" to "permissible exposure limits (PELS)." The new PELs incorporate the TLVs, and some PELs are lower. We must use the more protective standard.

Disposition - Accept.

30. HSP-20, 5th para, 3rd sent.: change "HNU-PI-101" to "HNU or OVM, an OVA,." Other instruments may be used.

Disposition - Accept with modifications as discussed on February 27, 1990.

31. HSP-20, 5th para, last sent.: replace "if different than" with "similar to." Specified in PJSP.

Disposition - Accept.

32. HSP-20, footnote: delete footnote. Material footnoted was deleted.

Disposition - Accept.

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33. HSP-21 5.0: replace 3rd bullet with: "Unusual odors or those characteristic of contaminants." Clarification.  
Disposition - Accept.
34. HSP-21 5.0: add to 4th bullet: "Measurements with"... Clarification.  
Disposition - Accept.
35. HSP-21 last para., last sent.: add ", OVM," after HNU. Instrument may be used.  
Disposition - Accept with modifications as discussed February 27, 1990.
36. HSP-22 Add between 1st and 2nd bullets: "Air Contaminants-Permissible Exposure Limits (PELs) 29 CFR 1910.1000 1989." Conforms to 1910.120.  
Disposition - Accept.
37. HSP-22 add to last bullet: "for substances that do not have either a TLV or a PEL." Conforms to 1910.120.  
Disposition - Accept.
38. HSP-23 1st para, 3rd sent.: delete "windblown." Redundant.  
Disposition - Accept.
39. HSP-23 5.3, 1st sent.: add "or OVM and an" between HNU and OVA. Instrument may be used.  
Disposition - Accept with modifications discussed February 27, 1990.
40. HSP-23 5.3 3rd sent.: delete text beginning "Calibration of the HNU"... and ending "with the 'gas select' setting at 3.0." EII will be followed.  
Disposition - Accept.
41. HSP-23 5.3: add as 2nd para.: "Instruments used by the site safety officer will be calibrated according to EII 3.1 (WHC-CM-7-7).

Instruments used to monitor organic vapors and gases will be checked for calibration daily before and after use, according to the manufacturer's recommended or approved method, with certified calibration gas.

Calibration information will be recorded in the field log book at the time of calibration. Field instruments will be calibrated at field ambient temperature. Conditions such as unusual humidity or temperatures that may affect instrument performance will be recorded in the field logbook." Good practice.

Disposition - Accept.

42. HSP-23 3rd para., last sent.: delete "whichever is less." Unnecessary.

Disposition - Accept.

43. HSP-23 5.3: delete 3rd and 4th para., replace with: "Each PJSP will contain action levels based on the hazards identified for that activity. The PJSP action levels may be lower, but will not be higher than, the following: A consistent reading in the breathing zone that is up to 2.5 ppm above the upwind background level for 5 minutes shall be the action level for donning air-purifying respirators equipped with the appropriate cartridges. Any indication of cartridge "breakthrough" must be reported to the site safety officer immediately. The site safety officer and field team leader will evaluate the situation and determine the action to be taken. Any breathing zone readings consistently greater than 2.5 ppm above background for 10 minutes, or greater than 10 ppm other than for a brief peak, will be the action level for temporarily discontinuing work, and upgrading the level of respiratory protection to Level B SCBAs or air-lines as specified in the PJSP." (Clarification, consideration of PJSP. Also 2.5ppm is 0.1 of the 25 ppm PEL for DOE-RL Order 5480.10A.)

Disposition - Accept with modifications discussed February 27, 1990.

44. HSP-24 5.4: change "Radioactive Monitoring" to "Radiation Monitoring." Correct word.

Disposition - Accept.

45. HSP-24 6.1, 1st sent.: replace "D-3 which must include the following:," with "will be specified in the unique PJSP for each job within the operable unit. The minimum level will be D-3 which must include the following:" The PJSP may require a higher level of protection initially.

Disposition - Accept with modifications per comment #120.

46. HSP-24 6.1, #2: change to "Steel-toed boots, leather boots, or other substantial protective footwear." Item at issue.

Disposition - Accept with modifications per comment #120.

47. HSP-24 6.1, #5: change "NBR or neoprene rubber" to "appropriate chemical-resistant." PPE specified in PJSP.

Disposition - Accept with modifications per comment #120.

48. HSP-25 1st para, 2nd sent.: change "Rubber" to "appropriate." PPE specified in PJSP.

Disposition - Accept with modifications per comment #120.

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49. HSP-25 #1: change to read "SWPs, if required, with surgical gloves, appropriate outer gloves, and rubber shoe covers." PJSP.

Disposition - Accept with modifications per comment #120.

50. HSP-25 #3: add "or other substantial protective footwear." PJSP.

Disposition - Accept with modifications per comment #120.

51. HSP- 25 #4: add "if rubber shoe covers are not being worn." Clarification.

Disposition - Accept with modifications per comment #120.

52. HSP-25 #6: add "if required in PJSP." PJSP.

Disposition - Accept with modifications per comment #120.

53. HSP-25 #7: change to "appropriate chemical-resistant outer gloves." PJSP.

Disposition - Accept with modifications per comment #120.

54. #8: add "if not worn with SWPs." Clarification.

Disposition - Accept with modifications per comment #120.

55. HSP-25 3rd para.: change "The" to "Level."

Disposition - Accept with modifications per comment #120.

56. HSP-25 4th para.: change "The" to "Level."

Disposition - Accept with modifications per comment #120.

57. HSP-25: add ", " after better; add "as required by 29 CFR 1910.134."

Disposition - Accept with modifications per comment #120.

58. HSP-26 #1: add "if required in the PJSP."

Disposition - Accept with modifications per comment #120.

59. HSP-26 #5: change "NBR" to "appropriate chemical-resistant." PJSP.

Disposition - Accept with modifications per comment #120.

60. HSP-26 #6: insert after "boots", "or other substantial protective footwear with outer rubber boots." Item at issue.

Disposition - Accept with modifications per comment #120.

61. HSP-26 6.2 1st para., 2nd sent.: insert "bulb" between "wet" and "globe"; insert "(WGBT)." after "temperature." Correct term.

Disposition - Accept.

62. HSP-26 6.2 2nd para., 1st sent.: insert "bulb" between "wet" and "globe"; insert "(WGBT)" after "temperature." Correct term.

Disposition - Accept.

63. HSP-26 6.2 3rd para.: replace last sentence with "The site safety officer and field team leader shall be immediately informed of the problem, and shall obtain emergency medical assistance as needed." Current procedure.

Disposition - Accept.

64. HSP-27 1st para., 4th sent.: insert "behavior that indicates" between "observe" and "such." Clarification.

Disposition - Accept.

65. HSP-27 : delete "and seek medical assistance immediately." Designated responsibility of certain team members.

Disposition - Accept.

66. HSP-27. add "Notify the site safety officer and field team leader who shall obtain emergency medical assistance." See Item 65.

Disposition - Accept.

67. HSP-27 7.0: change "exclusion" to "controlled." Access to outer zones should be limited as well.

Disposition - Accept.

68. HSP-28 8.0 1st para.: change "intrusion" to "entry." Clarification.

Disposition - Accept.

69. HSP-28 8.0 2nd para., 1st sent.: delete rest of sentence beginning with ", field workers...." Unnecessary.

Disposition - Accept.

70. HSP-28 2nd para.: change "removed" to "distant"; delete "so as" and replace with the following text: "Decontamination procedures shall be consistent with Level b and Level C decontamination protocol. Specific decontamination procedures will be provided in the PJSP. The following are examples of the equipment and facilities that may be used:" Clarification.

Disposition - Accept.

71. HSP-28 8.1, 1st sent.: add "or any other time they leave the contamination reduction zone." after "shift." Clarification. Contamination control.

Disposition - Accept.

72. HSP-28 8.1, 3rd sent.: delete "sealed", add "which will be sealed when full or at the end of each day." after "container." Clarification.

Disposition - Accept.

73. HSP-29 2nd sent.: insert "an HPT before proceeding to an uncontrolled area." after "surveyed by." RWP procedure. Contamination control.

Disposition - Accept.

74. HSP-29 2nd sent.: delete "the HPT shall be notified and." RWP procedure. The HPT will already know.

Disposition - Accept.

75. HSP-29 3rd sent.: replace "direction" with "discretion." RWP procedure; clarification.

Disposition - Accept.

76. HSP-29 4th sent.: change "BID-ASSAY" to bio-assay." Typo.

Disposition - Accept.

77. HSP-29 Add as 5th sent.: "Site specific radiation decontamination procedures will be provided in the RWP." Current procedure.

Disposition - Accept.

78. HSP-29 8.2 This section should be moved to the FSP or SAP. It is not appropriate in the HSP.

Disposition - Reject, as per discussion on February 27, 1990.

79. HSP-29 8.3, 1st para.; delete 2nd sentence. Contamination is not inevitable, even though the possibility exists.

Disposition - Accept.

80. HSP-29 8.3, 2nd para., 3rd sent.: insert "by the HPT" after "surveyed." RWP procedure.

Disposition - Accept.

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81. HSP-30 1st para.: before "(See Sampling...)", insert "detailed in EII 5.5." Current procedure.

Disposition - Accept.

82. HSP-30 8.4 1st sent.: replace "used based upon.." with "specified in the PJSP." Current procedure.

Disposition - Accept.

83. HSP-30 8.4 2nd sent.: add "airline" before "hoses"; change "where" to "when"; delete "and necessary." It is always necessary to protect airline hoses. Clarification.

Disposition - Accept.

84. HSP-30 8.5 delete this section; information included in 8.2. (Change table of contents too).

Disposition - Reject, see comment #78.

85. HSP-30 9.0 2nd para, 2nd sent.: add "When feasible," before "Personnel." Can't always do.

Disposition - Accept.

86. HSP-30 9.0 2nd para., 3rd sent.: insert "by the site safety officer and the field team leader" after "evaluation." Clarification.

Disposition - Accept.

87. HSP-31 1st line: replace "accordingly" with "to an emergency." Clarification.

Disposition - Accept.

88. HSP-31, 2nd para., 3rd Sent.: Delete 3rd sentence. This notification has already been made.

Disposition - Accept.

89. HSP-31 9.1 add as 1st para.: "Designated emergency response members of the field team shall be trained and certified in first aid and CPR. If an injury occurs, the designated team members will provide appropriate assistance." Prudent procedure.

Disposition - Accept.

90. HSP-31 9.1 delete 2nd sent.: "If the injured party..." Not necessary.

Disposition - Accept.

91. HSP-32 1st line: delete "moving", insert "is moved" after "person."  
Clarification.

Disposition - Accept.

92. HSP-32 delete paras. 2,3, and 4. These actions are to be determined by the designated first aid personnel at the site.

Disposition - Accept.

93. HSP-32 4th para.: replace "stroke" with "illness." More protective.

Disposition - Accept.

94. HSP-32 4th para.: replace "All personnel" with "Designated first aid personnel, if within the exclusion zone,..." Current practice.

Disposition - Accept.

95. HSP-032 #5: replace with "Proceed with first aid for heat illness."  
Inappropriate detail.

Disposition - Accept.

96. HSP-32 delete 5th para. Unnecessary.

Disposition - Accept.

97. HSP-32 6th para., 1st sent.: insert "and decontamination" after "emergency"; delete rest of para. after "stroke"; add "then proceed with first aid for hypothermia." Clarification.

Disposition - Accept.

98. HSP-32 9.2 1st sent.: change "will assess the nature of the injury" to "will assess the situation." Clarification.

Disposition - Accept.

99. HSP-34 9.3 4th para., #3: change "notification" to "discovery."  
Clarification.

Disposition - Accept.

100. HSP-34 4th para.: move #3 to #1; Appropriate priorities.

Disposition - Accept.

101. HSP-35 1st para.: insert as 2nd sent.: "In the event of respiratory protection failure, the primary concern will be getting the person to breathable air, and decontamination will be secondary." Priority clarification.

Disposition - Accept.

102. HSP-35 9.6 add as last sent.: "site specific situations will be covered in more detail in the PJSP." Clarification.

Disposition - Accept.

103. HSP-35 9.7 delete text of entire section. Replace with "Responses of this nature will be covered in the PJSP. Designated first aid field team members will be briefed on these procedures from the PJSP and only those designated individuals will treat the exposed person. The site safety officer or field team leader should be notified of any chemical exposure incidents as soon as possible, so that appropriate actions may be taken to prevent further exposure." Responses should be tailored to type of chemical contamination. Procedures listed are part of required 40h training and do not need to be detailed here.

Disposition - Accept.

104. HSP-23 1st para.: insert as next to last sent.: "Water mists may be used to control the resultant suspension of natural dusts and contaminants, as appropriate." Hazard mitigation.

Disposition - Accept.

105. Hsp-27 6.3 insert as 2nd sent.: "Portable heaters, insulated work clothing, and access to a heated vehicle or other enclosure may be provided as needed to help mitigate cold stress. Hazard mitigation.

Disposition - Accept.

106. WP-60 3.1.2, 2nd para.: should read "the low number of" Typo.

Disposition - Accept.

107. WP-62 2nd para., part of sent. misarranged. Typo

Disposition - Accept.

108. WP-151 2nd para., 1st sent.: change "refined" to "defined". Typo

Disposition - Accept.

109. WP-99, Table 29. Column headings are shifted. Typo

Disposition - Accept.

110. WP-QAPP-8, 3rd para., last sent.: change "that" to "the".

Disposition - Accept.

111. PMP-3 3rd para., replace "from...activities" with "at the jobsite".

Disposition - Accept.

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112. HSP-18 Table 7. Add target organs. Insufficient hazard information.

Disposition - Accept.

113. HSP-17 Table 6. Add target organs. Insufficient hazard information.

Disposition - Accept.

114. Suggested changes for Table 7.: Move information about protection levels to underneath title. Change Col. heading "Primary hazards and symptoms" to "Primary Hazards of Excessive Exposure and Target Organs" and add another column for "Route of Exposure".

Chromium: Irritation of eyes, respiratory tract, and skin. Allergic sensitizer. Damage to lungs, liver and kidneys. Causes cancer.

Toxic if inhaled, ingested, or absorbed through skin.

Warning Properties: Irritation.

PCB: Irritation of eyes and skin. Chloracne. Cumulative liver damage. Causes cancer.

Toxic if inhaled, ingested, or absorbed through skin.

Methylene chloride: Central nervous system depression, with dizziness, mental confusion, incoordination, nausea, headache, vomiting. Causes cancer.

Toxic if inhaled, ingested, or absorbed through skin.

Trichloroethylene: Central nervous system depression, with headache, vertigo, tremors, vomiting. Irritation of eyes. Dermatitis. Facial flush. Teratogen. Causes cancer.

Toxic if inhaled, ingested or absorbed through skin.

Tetrachloroethylene: Central nervous system depression, with headache, dizziness, nausea, flush. Irritation of eyes, nose, and throat. Damage to liver and kidneys. May cause cancer.

Toxic if inhaled, ingested, or absorbed through skin.

Disposition - Accept with modifications discussed February 27, 1990.

115. HSP-20 3RD PARA.- change from 3rd sent. to "The appropriate level of personal protective clothing and respiratory protection will vary from soil sampling during drilling operations to sampling Columbia river water. These levels of protection will be up- or down-graded as appropriate, based on real-time hazard evaluation and action levels discussed in Section 5.0".

Disposition - Accept with slight modification.

116. HSP-20 last para, 3rd sent. Add "The site safety officer will periodically monitor airborne levels of toxic vapors and gases with direct-reading field instruments selected for the anticipated hazards. A detailed monitoring plan, with frequency and location of measurements, specific chemical hazards, and type and mode of detection instrument to be used will be included in each PJSP."

Disposition - Accept.

117. HSP-21 delete last sent. on pg. and the footnote. Item 116.

Disposition - Accept.

118. HSP-22 5.2 delete 2nd sent.

Disposition - Accept.

119. HSP-23 After Item 43. Add, "Warning and action levels will be based on criteria referenced in DOE/RL Order 5480.10A". This is for carcinogens - specifies 0.1 of the applic. exposure limits.

Disposition - Accept.

120. HSP-24 6.0 replace section of PPE lists: "Personal protective clothing and respiratory protection shall be selected to limit exposure to anticipated chemical and radiological hazards. Work practices and engineering controls as described will also be used to control exposures, since a PPE ensemble alone cannot protect against all hazards. The following guidelines will be used to specify PPE ensembles, based on the potential hazards determined in the PJSP:

Occupational Safety and Health Standards, 29 CFR 1910.120 (OSHA 1988a)  
NIOSH/OSHA/USCG/EPA Guidance Manual

Disposition - Accept.

## ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM

1. DATE 12/14/892. PAGE 1 OF 4

3. DOCUMENT TITLE/NUMBER

DRAFT RI/FS Work Plan for the 300-FF-1 Operable Unit, DOE/RL 88-31

4. LEAD ENGINEER/SCIENTIST L. C. Hulstrom5. ORGANIZATION Env. Eng.6. LOCATION/PHONE/MSIN 450 Hills/376-4034/H4-557. REVIEWER J. B. Levine / R. J. Thomas8. ORGANIZATION Health Physics9. LOCATION/PHONE/MSIN 1720K / 3-3308 / X3-50

10. THE DOCUMENT WAS REVIEWED AND THE REVIEWER HAD NO COMMENTS.

Reviewer \_\_\_\_\_

11. Date \_\_\_\_\_

12. I HAVE REVIEWED THE DISPOSITION OF COMMENTS WITH THE  
EEG LEAD ENGINEER/SCIENTISTReviewer [Signature]13. Date 4 Jan 90

14. ITEM	15. COMMENT(S) Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment). *	16. DISPOSITION (Provide Brief Justification if NOT Accepted). *
1.	HSP, Sec. 1.2, Page HSP-3, Second paragraph: This section calls for a PNL RWP - This is incorrect. The RWP will be a Westinghouse RWP. Also, The last sentence of this paragraph calls for an additional industrial hygienist to provide downwind air sampling. This sentence needs to be expanded - HAZMAT monitoring may be accomplished by the IH, but radiological monitoring will be accomplished by the HPT.	Replace PNL with "appropriate" Last sentence expanded according to comment.
2.	HSP, Sec. 1.4, Page HSP-5, Second paragraph: The 3 day direct supervision of inexperienced employees should be conducted by the safety officer or field team leader. <u>NOT</u> any person.	Sentence corrected as per comment.
3.	HSP, Sec. 2.1.2, Page HSP-7, 8th Bullet on this page: The referenced radiation safety document no longer exists; this section should read as follows: "Requirements of WHC-CM-4-10 (Radiation Protection Manual) and WHC-CM-4-15 (Radiation Work Permits Manual) shall	Section reworded as recommended, however without reference to the specific manuals since they are not cleared as yet.

\*Comments and Dispositions May also be Presented in Sequential Format Instead of the Left/Right Format Shown Above. Comments May also be Submitted on 5 1/4" Disk, Using Wordperfect Ver. 4.2. In this Case the Reviewer Must Submit Page 1, a Printed Listing of the Comments and the Disk.

ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM (CONT.)

REVIEWER J. B. Levine / R. J. Thomas

PAGE 2 OF 4

ITEM	COMMENT(S) (Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment).	DISPOSITION (Provide Brief Justification if NOT Accepted).
	<p>Item 3, continued: be followed for all work involving radioactive materials or conducted within a radiologically controlled area. Last Bullet this page: Sentence is incomplete - perhaps some wording was omitted.</p> <p>4. HSP, Sec. 2.1.3, Page HSP-8, 3rd bullet: This item directs personnel to shower at home or as soon as possible after leaving the work site if directed to do so - <u>ALL</u> decontamination shall be performed <u>PRIOR</u> to leaving the work site or Hanford areas. Radiological decontamination at home is not permitted.</p> <p>5. HSP, Sec. 4.2, Page HSP-19, Item 1 - Beta irradiation is not a correct term - delete the word irradiation.</p> <p>6. HSP, Sec. 5.3, Page HSP-23, 3rd paragraph - requires use of half-face air purifying respirators - Half-face masks are not approved for use on the Hanford site for radionuclides - this section may need to address this for work to be conducted inside potential airborne radionuclide areas.</p> <p>7. HSP, Sec. 7.0, Page HSP-27, 1st paragraph, Fourth Sentence, calls for the exclusion area to be marked with radiation zone rope and radiation area signs. In order to be in compliance with WHC-CM-4-10, Sec. 7 (posting) areas established for greater than 90 days shall use chain, not rope. Radiation area signs are for areas greater than 2 mR/hr - The correct sign(s)</p>	<p>Last bullet-wording corrected</p> <p>changed to reflect requirement to shower, (if required), prior to leaving the work site or Hanford areas.</p> <p>deleted irradiation.</p> <p>"Half-face" removed.</p> <p>Additional sentence added to specify need for chain when appropriate.</p>

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ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM (CONT.)

REVIEWER J. B. Levine / R. J. Thomas

PAGE 3 OF 4

ITEM	COMMENT(S) (Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment).	DISPOSITION (Provide Brief Justification if NOT Accepted).
	<p>Item 7, continued:</p> <p>for these areas would be either "Controlled Area" or "Surface Contamination Area."</p> <p>8. HSP, Sec. 8.0, Page HSP-28, 2nd paragraph, 4th sentence, states that the decontamination area <u>SHALL</u> be upwind of the work site. Consider changing this to "The decon station will be positioned upwind (based on the recorded predominant wind direction) and sufficiently removed from the work site so as to allow for errant wind gusts, which may occasionally blow in from the work site." Without this clause, you may find yourself in violation of the HSP or moving your decon station every time the wind changes direction.</p> <p>9. HSP, Sec. 8.1, Page HSP-28, 1st paragraph, 6th sentence. Change to read: "If radioactive contamination is detected, the HPT shall be notified and the individual escorted to an appropriate decontamination area by the HPT. At the HPT's direction, nasal smears may be taken for counting and/or analysis. Health Physics Dosimetry shall be notified and the determination as to further BIO-ASSAY, if needed, will be made at that time.</p> <p>10. HSP, Sec. 9.0, Page HSP-30, needs to mention that individuals leaving a radiologically controlled area need to be released by the HPT, prior to going to First Aid or the hospital - If this cannot be accomplished, for</p>	<p>wording corrected</p> <p>suggested modification incorporated</p> <p>suggested revisions incorporated</p> <p>suggested wording added for clarification</p>

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ENVIRONMENTAL ENGINEERING GROUP COMMENT RECORD FORM (CONT.)

REVIEWER J. B. Levine / R. J. Thomas

PAGE 4 OF 4

ITEM	COMMENT(S) (Provide Technical Justification for the Comment and Proposed Action to Correct or Resolve the Comment).	DISPOSITION (Provide Brief Justification if NOT Accepted).
	<p>Item 10, continued:</p> <p>whatever reason, the HPT must accompany the individual to the First Aid Station or hospital. This is WHC H.P. Policy.</p> <p>11. HSP, Sec. 9.8, Page HSP-36, Emergency Contacts List - Individuals listed here are PNL employees - should be WHC employees, as follows:</p> <p>Industrial Safety - D. J. Alexander 3-2627</p> <p>Health Physics - J. B. Levine 3-1333</p> <p>Field Team Leaders - OK</p> <p>Environmental Reporting - To be determined.</p> <p>12. NO REFERENCE - GENERAL COMMENT:</p> <p>Due to recent contract wording changes, RPT has been changed to HPT. All references to RPT throughout this document should be changed to HPT.</p> <p>Also, "Operational Health Physics" has been changed to "Health Physics" and references made to Operational Health Physics (or OHP) should be changed accordingly.</p>	<p>WHC references added.</p> <p>H.N. Bowers used instead of D.J. Alexander.</p> <p>Accepted</p> <p>Accepted</p>

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